



183 Sitgreaves Street  
Phillipsburg, NJ 08865  
908-454-1161  
FAX 908-454-1026

November 18, 2013

**Via Email /Certified Mail**

22 NOV 2013 RCVD

Ed Choromanski, Director  
Air & Hazardous Materials Enforcement  
New Jersey Department of Environmental Protection  
401 East State Street, 2<sup>nd</sup> Floor  
PO Box 420  
Trenton, New Jersey 08625-0028

**Re: Atlantic States Cast Iron Pipe Company  
Subpart ZZZZZ Opacity Test Requirement  
Notification of Opacity Test results**

Dear Mr. Choromanski:

As you know, Atlantic States Cast Iron Pipe Company is subject to the National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries Area Sources at 40 CFR 63.10880 et seq. (the "Foundry NESHAP"). One of the requirements of the Foundry NESHAP is to conduct an opacity test for fugitive emissions from foundry operations. The federal regulations require reporting the results within sixty (60) days after performance of the opacity test if it is conducted with a performance test. The purpose of this letter is to report the results of the opacity test.

On October 15, 2013, Atlantic States conducted the opacity test for fugitive emissions from the foundry building using two certified opacity readers. Two certified observers were used to conduct the opacity test according to EPA Method 9 (40 CFR part 60, appendix A-4) and 40 CFR 63.6(h)(5). The Foundry NESHAP opacity standard for fugitive emissions from foundry buildings is 20% with an allowance of up to 30% during one six minute averaging period in any one hour. The fugitive emissions observed were within the federal NESHAP levels at all times during the test, Atlantic States was in compliance with the fugitive emission requirements of the



Ed Choromanski  
New Jersey Department of Environmental Protection  
Air Quality Enforcement  
Page 2 of 2

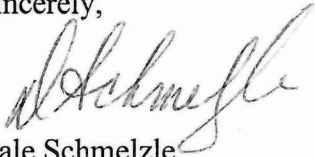
Operating Permit. Enclosed as Exhibit A are the logs of the opacity results by the certified opacity readers.

The federal regulations provide that "the certified observer may identify a limited number of openings or vents that appear to have the highest opacities and perform opacity observations on the identified openings or vents in lieu of performing observations for each opening or vent from the building or structure." The opacity test at the facility concentrated on the openings and vents that have the potential for the highest opacity readings from the foundry building. Enclosed as Exhibit B is a summary of the basis for the selection of the areas of the foundry building observed.

Lastly, the Foundry NESHAP requires that the facility certify that the capture system, for the control devices, operated normally during the performance test. Enclosed as Exhibit C is the certification required by the rule.

Should you have any questions, please contact Patrick Hennessy at (908) 878-0841.

Sincerely,

A handwritten signature in cursive script, appearing to read "D. Schmelzle", written in dark ink.

Dale Schmelzle  
V.P./General Manager

Cc: Steven Riva – EPA Region II  
Max Friedman





# Exhibit A



Atlantic States Cast Iron Pipe Company

Results and Notes from Opacity Observations of the Operating Facility

Date of opacity observation: October 15, 2013

Time of opacity observations: 8:15 AM – 11:15 AM

Opacity observers:

- Jason McEwen (north roadway area) from Atlantic States
- Ellen McNeel (main gas meter area) from Arrow Environmental Consultants

Results:

No % opacity readings were observed to be above 15%. The regulations [40 CFR 63.10895(e)] require that “If you own or operate a new or existing iron and steel foundry, you must not discharge to the atmosphere fugitive emissions from foundry operations that exhibit opacity greater than 20 percent (6-minute average), except for one 6-minute average per hour that does not exceed 30 percent.” Atlantic States is in compliance with this requirement.

Notes:

The observation of the south side and roof line of the operations building resulted in opacities of 0% at all times. There were no opacity readings at or greater than 20% at any time.

The observations of the north side and roof line of the operations building resulted in opacities no greater than 15%, which at times lasted several minutes. There were no opacity readings at or greater than 20% at any time.



# EPA VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)  
 Method 9 203A 203B Other: \_\_\_\_\_

Company Name Atlantic States Cast Iron Pipe Co.  
 Facility Name Atlantic States  
 Street Address 183 Sitgreaves St.  
 City Phillipsburg State NJ Zip 08865

Process Facility Unit # \_\_\_\_\_ Operating Mode Normal  
 Control Equipment Facility Building Operating Mode Normal

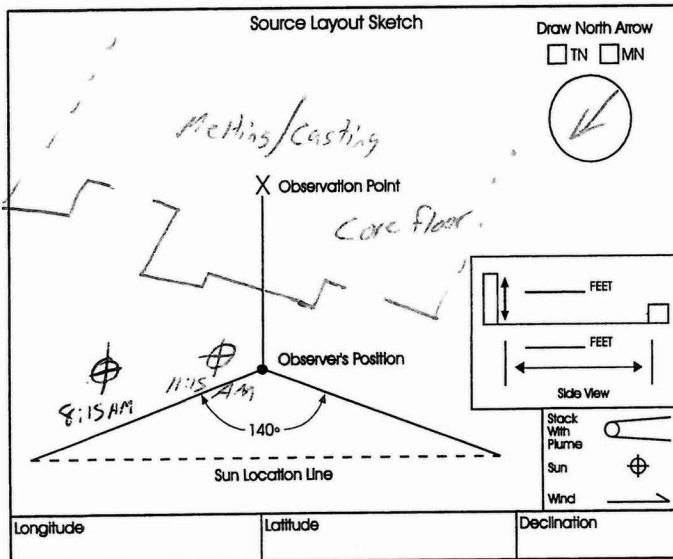
Describe Emission Point Roof line, building sides

Height of Emiss. Pt. 0 - ~80' Height of Emiss. Pt. Rel. to Observer  
 Start \_\_\_\_\_ End \_\_\_\_\_  
 Distance to Emiss. Pt. 0 - ~150' Direction to Emiss. Pt. (Degrees)  
 Start \_\_\_\_\_ End \_\_\_\_\_

Vertical Angle to Obs. Pt. \_\_\_\_\_ Direction to Obs. Pt. (Degrees)  
 Start \_\_\_\_\_ End \_\_\_\_\_  
 Distance and Direction to Observation Point from Emission Point  
 Start \_\_\_\_\_ End \_\_\_\_\_

Describe Emissions Smoke  
 Start \_\_\_\_\_ End \_\_\_\_\_  
 Emission Color White/Gray Water Droplet Plume  
 Start \_\_\_\_\_ End \_\_\_\_\_ Attached ☐ Detached ☐ None ☒

Describe Plume Background Clear sky  
 Start \_\_\_\_\_ End \_\_\_\_\_  
 Background Color Blue Sky Conditions Clear  
 Start \_\_\_\_\_ End \_\_\_\_\_  
 Wind Speed Mild Wind Direction \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_  
 Ambient Temp. ~50°F Wet Bulb Temp. \_\_\_\_\_ RH Percent \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_



Additional Information

Form Number \_\_\_\_\_ Page 1 Of 6  
 Continued on VEO Form Number \_\_\_\_\_

Observation Date		Time Zone				Start Time	End Time
<u>10/15/13</u>		<u>EST</u>				<u>8:15 AM</u>	<u>11:15 AM</u>
Min	Sec	0	15	30	45	Comments	
1	0	0	0	0	0		
2	0	0	0	0	0		
3	0	0	0	0	0		
4	0	0	0	0	0		
5	0	0	0	0	0		
6	5	5	5	5	5	<u>Casting</u>	
7	5	5	5	5	5		
8	5	5	5	5	5		
9	5	5	5	5	5		
10	5	5	5	5	5		
11	5	5	5	5	5		
12	5	5	5	5	5		
13	5	5	5	5	5		
14	5	5	5	5	5		
15	5	5	5	5	5		
16	5	5	5	5	5		
17	5	5	5	5	5		
18	5	5	5	5	5		
19	5	5	5	5	5		
20	10	10	10	10	10		
21	10	10	10	10	10		
22	15	15	15	15	15		
23	15	10	10	10	10		
24	10	10	10	10	10		
25	5	5	5	5	5		
26	5	5	5	5	5		
27	5	5	5	5	5		
28	5	5	5	5	5		
29	5	5	5	5	5		
30	5	5	5	5	5		

Observer's Name (Print) Jason McEwen  
 Observer's Signature Jason McEwen Date 10/15/13  
 Organization Atlantic States  
 Certified By Penn State Univ. Date 10/8/13



# EPA VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)  
 Method 9      203A      203B      Other: \_\_\_\_\_

Company Name \_\_\_\_\_  
 Facility Name \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Process \_\_\_\_\_ Unit # \_\_\_\_\_ Operating Mode \_\_\_\_\_  
 Control Equipment \_\_\_\_\_ Operating Mode \_\_\_\_\_

Describe Emission Point  
 \_\_\_\_\_  
 \_\_\_\_\_  
 Height of Emiss. Pt. \_\_\_\_\_ Height of Emiss. Pt. Rel. to Observer \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_ Start \_\_\_\_\_ End \_\_\_\_\_  
 Distance to Emiss. Pt. \_\_\_\_\_ Direction to Emiss. Pt. (Degrees) \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_ Start \_\_\_\_\_ End \_\_\_\_\_

Vertical Angle to Obs. Pt. \_\_\_\_\_ Direction to Obs. Pt. (Degrees) \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_ Start \_\_\_\_\_ End \_\_\_\_\_  
 Distance and Direction to Observation Point from Emission Point  
 Start \_\_\_\_\_ End \_\_\_\_\_

Describe Emissions  
 Start \_\_\_\_\_ End \_\_\_\_\_  
 Emission Color \_\_\_\_\_ Water Droplet Plume  
 Start \_\_\_\_\_ End \_\_\_\_\_ Attached ☐ Detached ☐ None ☐

Describe Plume Background  
 Start \_\_\_\_\_ End \_\_\_\_\_  
 Background Color \_\_\_\_\_ Sky Conditions \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_ Start \_\_\_\_\_ End \_\_\_\_\_  
 Wind Speed \_\_\_\_\_ Wind Direction \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_ Start \_\_\_\_\_ End \_\_\_\_\_  
 Ambient Temp. \_\_\_\_\_ Wet Bulb Temp. \_\_\_\_\_ RH Percent \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_

Source Layout Sketch

Draw North Arrow  
☐ TN ☐ MN

X Observation Point  
 Observer's Position  
 140°  
 Sun Location Line

Side View  
 FEET  
 FEET  
 Stack With Plume  
 Sun  
 Wind

Longitude \_\_\_\_\_ Latitude \_\_\_\_\_ Declination \_\_\_\_\_

Additional Information  
 \_\_\_\_\_  
 \_\_\_\_\_

Form Number \_\_\_\_\_ Page 2 of 6  
 Continued on VEO Form Number \_\_\_\_\_

Observation Date		Time Zone				Start Time	End Time
Sec	Min	0	15	30	45	Comments	
1		S	S	S	S	Casting	
2		S	S	S	S		
3		S	S	S	S		
4		S	S	S	S		
5		S	S	S	S		
6		S	S	S	S		
7		S	S	S	S		
8		S	S	S	S		
9		S	S	S	S		
10		S	S	S	S		
11		S	S	S	S		
12		S	S	S	S		
13		S	S	S	S		
14		S	S	S	S		
15		S	S	S	S		
16		S	S	S	S		
17		S	S	S	S		
18		S	S	S	S		
19		S	S	S	S		
20		S	S	S	S		
21		S	S	S	S		
22		S	S	S	S		
23		S	S	S	S		
24		S	S	S	S		
25		S	S	S	S		
26		S	S	S	S		
27		S	S	S	S		
28		S	S	S	S		
29		S	S	S	S		
30		S	S	S	S		

8:45

Observer's Name (Print) \_\_\_\_\_  
 Observer's Signature \_\_\_\_\_ Date \_\_\_\_\_  
 Organization \_\_\_\_\_  
 Certified By \_\_\_\_\_ Date \_\_\_\_\_





# EPA VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)  
Method 9      203A      203B      Other: \_\_\_\_\_

Company Name \_\_\_\_\_  
Facility Name \_\_\_\_\_  
Street Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Process \_\_\_\_\_ Unit # \_\_\_\_\_ Operating Mode \_\_\_\_\_  
Control Equipment \_\_\_\_\_ Operating Mode \_\_\_\_\_

Describe Emission Point \_\_\_\_\_  
Height of Emiss. Pt. \_\_\_\_\_ Height of Emiss. Pt. Rel. to Observer \_\_\_\_\_  
Start \_\_\_\_\_ End \_\_\_\_\_ Start \_\_\_\_\_ End \_\_\_\_\_  
Distance to Emiss. Pt. \_\_\_\_\_ Direction to Emiss. Pt. (Degrees) \_\_\_\_\_  
Start \_\_\_\_\_ End \_\_\_\_\_ Start \_\_\_\_\_ End \_\_\_\_\_

Vertical Angle to Obs. Pt. \_\_\_\_\_ Direction to Obs. Pt. (Degrees) \_\_\_\_\_  
Start \_\_\_\_\_ End \_\_\_\_\_ Start \_\_\_\_\_ End \_\_\_\_\_  
Distance and Direction to Observation Point from Emission Point \_\_\_\_\_  
Start \_\_\_\_\_ End \_\_\_\_\_

Describe Emissions \_\_\_\_\_  
Start \_\_\_\_\_ End \_\_\_\_\_  
Emission Color \_\_\_\_\_ Water Droplet Plume \_\_\_\_\_  
Start \_\_\_\_\_ End \_\_\_\_\_ Attached ☐ Detached ☐ None ☐

Describe Plume Background \_\_\_\_\_  
Start \_\_\_\_\_ End \_\_\_\_\_  
Background Color \_\_\_\_\_ Sky Conditions \_\_\_\_\_  
Start \_\_\_\_\_ End \_\_\_\_\_ Start \_\_\_\_\_ End \_\_\_\_\_  
Wind Speed \_\_\_\_\_ Wind Direction \_\_\_\_\_  
Start \_\_\_\_\_ End \_\_\_\_\_ Start \_\_\_\_\_ End \_\_\_\_\_  
Ambient Temp. \_\_\_\_\_ Wet Bulb Temp. \_\_\_\_\_ RH Percent \_\_\_\_\_  
Start \_\_\_\_\_ End \_\_\_\_\_

Source Layout Sketch

Draw North Arrow ☐ TN ☐ MN

Observer's Position

Observation Point

140°

Sun Location Line

FEET

FEET

Side View

Stack With Plume

Sun

Wind

Longitude \_\_\_\_\_ Latitude \_\_\_\_\_ Declination \_\_\_\_\_

Additional Information \_\_\_\_\_  
\_\_\_\_\_

Form Number \_\_\_\_\_ Page 3 of 6  
Continued on VEO Form Number \_\_\_\_\_

Observation Date			Time Zone		Start Time	End Time
Sec Min	0	15	30	45	Comments	
1	S	S	S	S	Casting	
2	S	S	S	S		
3	S	S	S	S		
4	S	S	S	S		
5	S	S	S	S		
6	S	S	S	S		
7	S	S	S	S		
8	S	S	S	S		
9	S	S	S	S		
10	S	S	S	S		
11	S	S	S	S		
12	S	S	S	S		
13	S	S	S	S		
14	S	S	S	S		
15	S	S	S	S		
16	S	S	S	S		
17	S	S	S	S		
18	S	S	S	S		
19	S	S	S	S		
20	S	S	S	S		
21	S	S	S	S		
22	S	S	S	S		
23	S	S	S	S		
24	S	S	S	S		
25	S	S	S	S		
26	S	S	S	S		
27	S	S	S	S		
28	S	S	S	S		
29	S	S	S	S		
30	S	S	S	S		

9:15

Observer's Name (Print) \_\_\_\_\_  
Observer's Signature \_\_\_\_\_ Date \_\_\_\_\_  
Organization \_\_\_\_\_  
Certified By \_\_\_\_\_ Date \_\_\_\_\_



# EPA VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)  
Method 9 203A 203B Other: \_\_\_\_\_

Company Name  
Facility Name  
Street Address  
City State Zip

Process Unit # Operating Mode  
Control Equipment Operating Mode

Describe Emission Point  
Height of Emiss. Pt. Start End Height of Emiss. Pt. Rel. to Observer Start End  
Distance to Emiss. Pt. Start End Direction to Emiss. Pt. (Degrees) Start End

Vertical Angle to Obs. Pt. Start End Direction to Obs. Pt. (Degrees) Start End  
Distance and Direction to Observation Point from Emission Point Start End

Describe Emissions  
Start End  
Emission Color Water Droplet Plume  
Attached ☐ Detached ☐ None ☐

Describe Plume Background  
Start End  
Background Color Sky Conditions Start End  
Wind Speed Wind Direction Start End  
Ambient Temp. Wet Bulb Temp. RH Percent  
Start End

Source Layout Sketch

Draw North Arrow  
☐ TN ☐ MN

Observer's Position

Observation Point

Sun Location Line

140°

FEET

FEET

Side View

Stack With Plume

Sun

Wind

Longitude Latitude Declination

Form Number \_\_\_\_\_ Page 4 of 6  
Continued on VEO Form Number \_\_\_\_\_

Observation Date		Time Zone				Start Time	End Time
Sec	Min	0	15	30	45	Comments	
1	S	S	S	S	S	Casting	
2	S	S	S	S	S		
3	S	S	S	S	S		
4	S	S	S	S	S		
5	S	S	S	S	S		
6	S	S	S	S	S		
7	S	S	S	S	S		
8	S	S	S	S	S		
9	S	S	S	S	S		
10	S	S	S	S	S		
11	S	S	S	S	S		
12	S	S	S	S	S		
13	S	S	S	S	S		
14	S	S	S	S	S		
15	S	S	S	S	S		
16	S	S	S	S	S		
17	S	S	S	S	S		
18	S	S	S	S	S		
19	S	S	S	S	S		
20	S	S	S	S	S		
21	S	S	S	S	S		
22	S	S	S	S	S		
23	S	S	S	S	S		
24	S	S	S	S	S		
25	S	S	S	S	S		
26	S	S	S	S	S		
27	S	S	S	S	S		
28	S	S	S	S	S		
29	S	S	S	S	S		
30	S	S	S	S	S		

9:45

Observer's Name (Print)  
Observer's Signature Date  
Organization  
Certified By Date

Additional Information



# EPA VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)  
 Method 9      203A      203B      Other: \_\_\_\_\_

Form Number \_\_\_\_\_ Page 5 of 6  
 Continued on VEO Form Number \_\_\_\_\_

Company Name \_\_\_\_\_  
 Facility Name \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Process \_\_\_\_\_ Unit # \_\_\_\_\_ Operating Mode \_\_\_\_\_  
 Control Equipment \_\_\_\_\_ Operating Mode \_\_\_\_\_

Describe Emission Point \_\_\_\_\_  
 \_\_\_\_\_  
 Height of Emiss. Pt. \_\_\_\_\_ Height of Emiss. Pt. Rel. to Observer \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_ Start \_\_\_\_\_ End \_\_\_\_\_  
 Distance to Emiss. Pt. \_\_\_\_\_ Direction to Emiss. Pt. (Degrees) \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_ Start \_\_\_\_\_ End \_\_\_\_\_

Vertical Angle to Obs. Pt. \_\_\_\_\_ Direction to Obs. Pt. (Degrees) \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_ Start \_\_\_\_\_ End \_\_\_\_\_  
 Distance and Direction to Observation Point from Emission Point \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_

Describe Emissions \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_  
 Emission Color \_\_\_\_\_ Water Droplet Plume \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_ Attached ☐ Detached ☐ None ☐

Describe Plume Background \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_  
 Background Color \_\_\_\_\_ Sky Conditions \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_ Start \_\_\_\_\_ End \_\_\_\_\_  
 Wind Speed \_\_\_\_\_ Wind Direction \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_ Start \_\_\_\_\_ End \_\_\_\_\_  
 Ambient Temp. \_\_\_\_\_ Wet Bulb Temp. \_\_\_\_\_ RH Percent \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_

Observation Date		Time Zone				Start Time	End Time
Sec	Min	0	15	30	45	Comments	
1		S	S	S	S	Casting	
2		S	S	S	S		
3		S	S	S	S		
4		S	S	S	S		
5		S	S	S	S		
6		S	S	S	S		
7		S	S	S	S		
8		S	S	S	S		
9		S	S	S	S		
10		S	S	S	S		
11		S	S	S	S		
12		S	S	S	S		
13		S	S	S	S		
14		S	S	S	S		
15		S	S	S	S		
16		S	S	S	S		
17		S	S	S	S		
18		S	S	S	S		
19		S	S	S	S		
20		S	S	S	S		
21		S	S	S	S		
22		S	S	S	S		
23		S	S	S	S		
24		S	S	S	S		
25		S	S	S	S		
26		S	S	S	S		
27		S	S	S	S		
28		S	S	S	S		
29		S	S	S	S		
30		S	S	S	S		

10:15

Source Layout Sketch

Draw North Arrow  
☐ TN ☐ MN

Observer's Position

Observation Point

Sun Location Line

140°

FEET

FEET

Side View

Stack With Plume

Sun

Wind

Longitude \_\_\_\_\_ Latitude \_\_\_\_\_ Declination \_\_\_\_\_

Additional Information \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Observer's Name (Print) \_\_\_\_\_  
 Observer's Signature \_\_\_\_\_ Date \_\_\_\_\_  
 Organization \_\_\_\_\_  
 Certified By \_\_\_\_\_ Date \_\_\_\_\_



# EPA VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)  
 Method 9      203A      203B      Other: \_\_\_\_\_

Company Name \_\_\_\_\_  
 Facility Name \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Process \_\_\_\_\_ Unit # \_\_\_\_\_ Operating Mode \_\_\_\_\_  
 Control Equipment \_\_\_\_\_ Operating Mode \_\_\_\_\_

Describe Emission Point \_\_\_\_\_  
 \_\_\_\_\_  
 Height of Emiss. Pt. \_\_\_\_\_ Height of Emiss. Pt. Rel. to Observer \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_ Start \_\_\_\_\_ End \_\_\_\_\_  
 Distance to Emiss. Pt. \_\_\_\_\_ Direction to Emiss. Pt. (Degrees) \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_ Start \_\_\_\_\_ End \_\_\_\_\_

Vertical Angle to Obs. Pt. \_\_\_\_\_ Direction to Obs. Pt. (Degrees) \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_ Start \_\_\_\_\_ End \_\_\_\_\_  
 Distance and Direction to Observation Point from Emission Point \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_

Describe Emissions \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_  
 Emission Color \_\_\_\_\_ Water Droplet Plume \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_ Attached ☐ Detached ☐ None ☐

Describe Plume Background \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_  
 Background Color \_\_\_\_\_ Sky Conditions \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_ Start \_\_\_\_\_ End \_\_\_\_\_  
 Wind Speed \_\_\_\_\_ Wind Direction \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_ Start \_\_\_\_\_ End \_\_\_\_\_  
 Ambient Temp. \_\_\_\_\_ Wet Bulb Temp. \_\_\_\_\_ RH Percent \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_

Source Layout Sketch

Draw North Arrow  
☐ TN ☐ MN

FEET

FEET

Side View

Stack With Plume

Sun

Wind

Longitude \_\_\_\_\_ Latitude \_\_\_\_\_ Declination \_\_\_\_\_

Additional Information \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Form Number \_\_\_\_\_ Page 6 Of 6  
 Continued on VEO Form Number \_\_\_\_\_

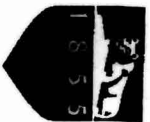
Observation Date			Time Zone		Start Time	End Time
Sec Min	0	15	30	45	Comments	
1	S	S	S	S	Casting	
2	S	S	S	S		
3	S	S	S	S		
4	S	S	S	S		
5	S	S	S	S		
6	S	S	S	S		
7	S	S	S	S		
8	S	S	S	S		
9	S	S	S	S		
10	S	S	S	S		
11	S	S	S	S		
12	S	S	S	S		
13	S	S	S	S		
14	S	S	S	S		
15	S	S	S	S		
16	S	S	S	S		
17	S	S	S	S		
18	S	S	S	S		
19	S	S	S	S		
20	S	S	S	S		
21	S	S	S	S		
22	S	S	S	S		
23	S	S	S	S		
24	S	S	S	S		
25	S	S	S	S		
26	S	S	S	S		
27	S	S	S	S		
28	S	S	S	S		
29	S	S	S	S		
30	S	S	S	S		

Observer's Name (Print) \_\_\_\_\_  
 Observer's Signature \_\_\_\_\_ Date \_\_\_\_\_  
 Organization \_\_\_\_\_  
 Certified By \_\_\_\_\_ Date \_\_\_\_\_





PENNSTATE



# Continuing Education

## Visible Emissions Evaluation Program

This certifies that

**JASON MCEWEN**


has met the specifications of Federal EPA Reference Method 9 and qualified as a visible emissions evaluator. Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by The Pennsylvania State University.

Certification valid

FROM: *October 8, 2013*

TO: *April 8, 2014*

  
Director of Conferences

  
Visible Emissions Certification  
Field Test Instructor



1 of 6

# VISIBLE EMISSION OBSERVATION FORM

Company Name <b>Atlantic States</b>		Observation Date <b>10/15/13</b>		Start Time <b>0815</b>		End Time <b>1115</b>	
Location <b>Foundry</b>							
City <b>Philipsburg</b>	State <b>NJ</b>	Zip					
Process Equipment <b>Foundry</b>		Operating Mode					
Control Equipment		Operating Mode					
Describe Emission Point <b>roofline / top of foundry</b>							
Height of Emission Point <b>88ft.</b>		Height Relative to Observer Start <b>48ft.</b> End <b>48ft.</b>					
Distance to Emission Point Start <b>45-80ft.</b> End <b>45-80ft.</b>		Direction to Emission Point Start <b>N-NW</b> End <b>N-NW</b>					
Vertical Angle to Observation Pt. Start <b>75°</b> End <b>75°</b>		Direction to Observation Point Start <b>N-NW</b> End <b>N-NW</b>					
Describe Emissions Start <b>none</b> End <b>none</b>							
Emission Color Start <b>none</b> End <b>none</b>		If Water Droplet Plume (Circle) Attached Detached <b>(N/A)</b>					
Point In The Plume At Which Opacity Was Determined Start <b>45ft.</b> End <b>45ft.</b>							
Describe Plume Background Start <b>clear sky</b> End <b>clear sky</b>							
Background Color Start <b>blue</b> End <b>blue</b>		Sky Condition Start <b>clear</b> End <b>clear</b>					
Wind Speed Start <b>variable</b> End <b>light</b>		Wind Direction Start <b>NE</b> End <b>NE</b>					
Ambient Temp Start <b>50°F</b> End <b>57°F</b>		Wet Bulb Temp		RH Percent			
<p><b>SOURCE LAYOUT SKETCH</b></p> <p>The diagram shows an 'OBSERVER'S POSITION' at the bottom. A vertical line points up to an 'EMISSION OBSERVATION POINT' marked with an 'X'. A dashed line labeled 'SUN LOCATION LINE' extends from the observer's position towards the right. A legend box on the left shows symbols for 'STACK WITH PLUME' (a vertical line with a horizontal bar), 'SUN' (a circle with a dot), and 'WIND' (an arrow). A north arrow labeled 'DRAW NORTH ARROW' points upwards. An angle of '140°' is indicated between the sun location line and the line to the emission point.</p>							
Additional Information							

Min	Sec	0	15	30	45	Comments
1		0	0	0	0	
2		0	0	0	0	
3		0	0	0	0	
4		0	0	0	0	
5		0	0	0	0	
6		0	0	0	0	
7		0	0	0	0	
8		0	0	0	0	
9		0	0	0	0	
10		0	0	0	0	
11		0	0	0	0	
12		0	0	0	0	
13		0	0	0	0	
14		0	0	0	0	
15		0	0	0	0	
16		0	0	0	0	
17		0	0	0	0	
18		0	0	0	0	
19		0	0	0	0	
20		0	0	0	0	
21		0	0	0	0	
22		0	0	0	0	
23		0	0	0	0	
24		0	0	0	0	
25		0	0	0	0	
26		0	0	0	0	
27		0	0	0	0	
28		0	0	0	0	
29		0	0	0	0	
30		0	0	0	0	0845

Observer's Name (Print) <b>Ellen M. McNeel</b>	
Observer's Signature <i>Ellen M. McNeel</i>	Date <b>10/15/13</b>
Organization <b>Arrow Envir. Consulting LLC</b>	
Certified by <b>Penn State</b>	Date <b>10/15/13</b>

Continue on reverse side



2 of 6  
Atlantic States

Min	Sec	0	15	30	45	Comments
31		0	0	0	0	0846
32		0	0	0	0	
33		0	0	0	0	
34		0	0	0	0	
35		0	0	0	0	
36		0	0	0	0	
37		0	0	0	0	
38		0	0	0	0	
39		0	0	0	0	
40		0	0	0	0	
41		0	0	0	0	
42		0	0	0	0	
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47		0	0	0	0	
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49		0	0	0	0	
50		0	0	0	0	
51		0	0	0	0	
52		0	0	0	0	
53		0	0	0	0	
54		0	0	0	0	
55		0	0	0	0	
56		0	0	0	0	
57		0	0	0	0	
58		0	0	0	0	* wind shift; Stead plume across observation pt.
59		0	0	0	0	↓
60		0	0	0	0	0915 ↓

Additional Information




3 of 6

Atlantic States

Min \ Sec	0	15	30	45	Comments
61	0	0	0	0	0910
62	0	0	0	0	
63	0	0	0	0	
64	0	0	0	0	
65	0	0	0	0	A wind shift, clear obs. pt.
66	0	0	0	0	
67	0	0	0	0	
68	0	0	0	0	
69	0	0	0	0	
70	0	0	0	0	* wind shift; from west
71	0	0	0	0	steam plume in observation
72	0	0	0	0	pt. ↓
73	0	0	0	0	
74	0	0	0	0	
75	0	0	0	0	
76	0	0	0	0	out of plume (steam) from cooling tower
77	0	0	0	0	
78	0	0	0	0	
79	0	0	0	0	
80	0	0	0	0	
81	0	0	0	0	
82	0	0	0	0	
83	0	0	0	0	
84	0	0	0	0	
85	0	0	0	0	
86	0	0	0	0	
87	0	0	0	0	
88	0	0	0	0	
89	0	0	0	0	
90	0	0	0	0	0915

Additional Information





4 of 6  
Atlantic States

Min \ Sec	0	15	30	45	Comments
Q1	0	0	0	0	0915
Q2	0	0	0	0	
Q3	0	0	0	0	
Q4	0	0	0	0	
Q5	0	0	0	0	
Q6	0	0	0	0	
Q7	0	0	0	0	
Q8	0	0	0	0	
Q9	0	0	0	0	
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117	0	0	0	0	
118	0	0	0	0	
119	0	0	0	0	
120	0	0	0	0	1015

Additional Information




5 of 6

## Atlantic States

Min \ Sec	0	15	30	45	Comments
121	0	0	0	0	1016
122	0	0	0	0	
123	0	0	0	0	
124	0	0	0	0	
125	0	0	0	0	
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144	0	0	0	0	
145	0	0	0	0	
146	0	0	0	0	
147	0	0	0	0	
148	0	0	0	0	
149	0	0	0	0	
150	0	0	0	0	1045

Additional Information



bet 6  
Atlantic States

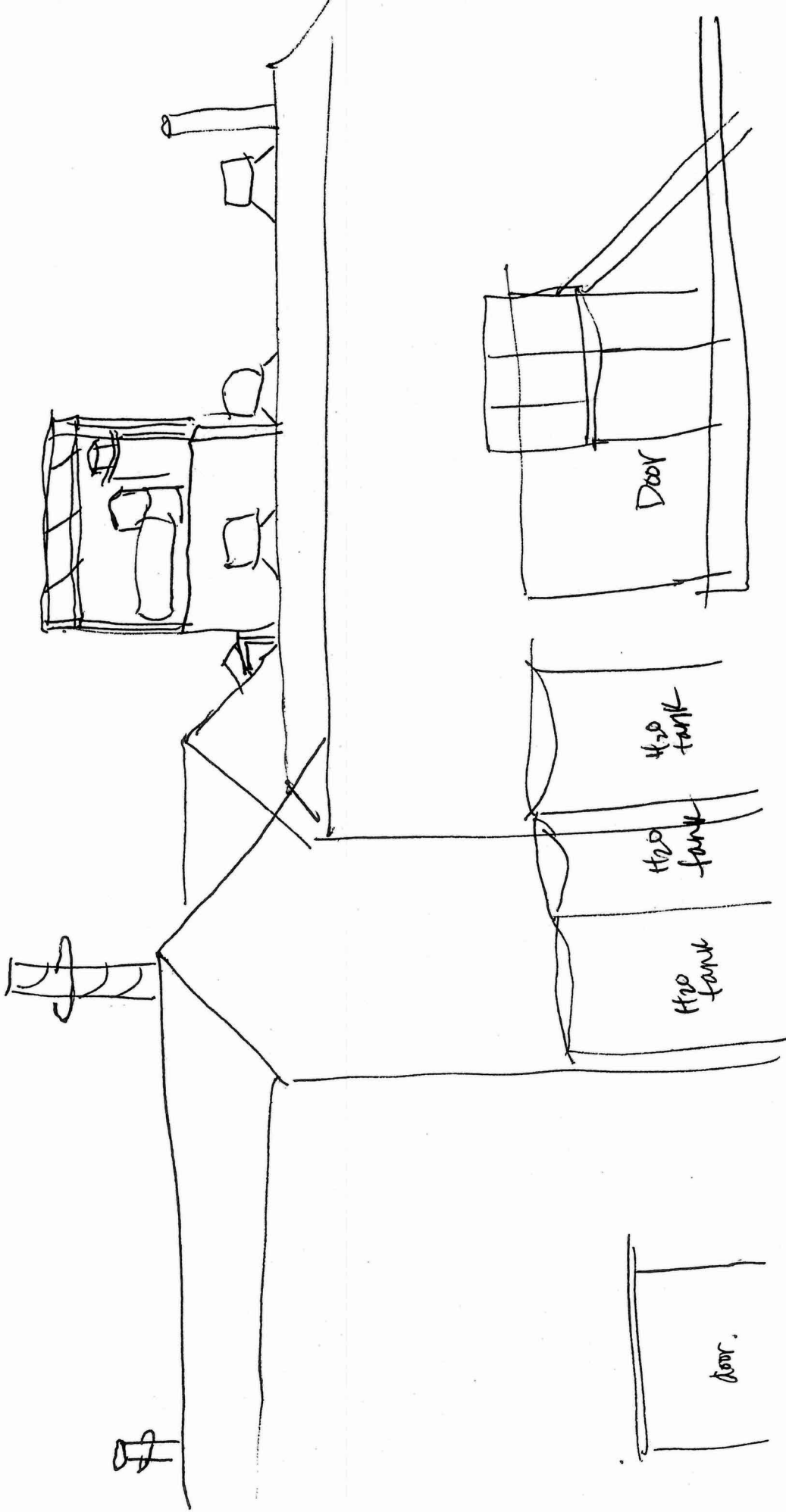
Min \ Sec	0	15	30	45	Comments
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155	0	0	0	0	
156	0	0	0	0	
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172	0	0	0	0	
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174	0	0	0	0	
175	0	0	0	0	
176	0	0	0	0	
177	0	0	0	0	
178	0	0	0	0	
179	0	0	0	0	
180	0	0	0	0	1115

Additional Information




Oct 15, 2013  
Alexandra

observation point







PENNSSTATE



# Continuing Education Visible Emissions Evaluation Program

This certifies that

**ELLEN M. MCNEEL**

has met the specifications of Federal EPA Reference Method 9 and qualified as a visible emissions evaluator.  
Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by The Pennsylvania State University.

Certification valid

FROM: *April 16, 2013*

TO: *October 15, 2013*

*Ronald A. Augustine*  
Director of Condensates

*Wm. R. Lee*  
Visible Emissions Certification  
Field Test Instructor



# Exhibit B



## Atlantic States Cast Iron Pipe Company

### Procedure for NESHAPS Requirement for Building Visible Opacity Observations [40 CFR 63.10895(e) and 63.10898(i)]

Atlantic States is required to conduct opacity readings on the foundry building once every 6 months. Atlantic States is also required to perform building opacity readings during stack tests and each time a process change is made that is likely to increase fugitive emissions.

#### **Observation Areas**

Opacity observations should be made of the entire Foundry Building; however, Table 1 2(a)(i) of subpart §63.6(h)(5) allows observations through a “limited number of openings or vents that appear to have the highest opacities and perform opacity observations on the identified openings or vents in lieu of performing observations for each opening or vent from the building or structure.” Atlantic States has chosen to use Table 1 2(a)(i) for the building opacity observations for several reasons. The main building has only 3 main areas that create visible emissions inside of the building. Those areas are the Melting, Casting and Core Floor areas. All three of these areas are physically located close to each other. The other operations in the facility generate much less visible emissions inside of the building. The melting, casting and core floor areas would generate the highest opacities from the building near the building openings associated with those areas. Based upon years of general observations, no visible emissions exclusive of water vapor have been observed coming out of the Static Foundry area, the annealing oven area, inspectors’ station after the oven, test presses, cement line, paint line and bundling areas, as well as the Machine Shop / Casting Mold repair building. As such, the building opacity observations only concentrated on the Melting, Casting and Core Floor areas that the building surrounds.

2 certified opacity observers were used simultaneously to conduct the opacity readings.

- The first observer was stationed near the gas shack (where the main gas meter is located just west of the main office building). That person observed the south face of the building from just beyond the main big door that leads to the Core Floor and the #7 layoff rail to the beginning of the Annealing Oven, which is marked by an unused red stack at the top of the building. All openings, doorways, windows and the roof were observed.
- The second observer was stationed on the north roadway that leads up to the Kuttner Baghouse. That person observed the north face of the building from where the doorway entrance to the old air compressor room (which is near the south west corner of the Melt Cooling Tower) to just past the main entrance door to the Melting Department. All openings, doorways and the roof were observed. This observer does have to walk around



a lot because the Melt Center Baghouse blocks most of the view of the building, so this person has to walk around the Baghouse in order to get a good view of all faces of the building.

### **Procedure**

Only current certified opacity observers will be used to conduct these observations. Observations will be recorded on a Visible Emissions Observation Form for each observer. At a pre-determined time, each observer will begin opacity readings of the doorways and openings of the building as described in the above section. This will take place for 3 consecutive 1-hour runs for a total of 3 hours. Upon completion of the test, the visible emissions observation forms will be collected and retained on file at Atlantic States.





# Exhibit C



## **Exhibit C**

### **Capture System Certification**

On October 15, 2013, Atlantic States Cast Iron Pipe Company conducted the three (3) 1-hour opacity tests required by the National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries Area Sources at 40 CFR 63.10880 et seq. (the "Foundry NESHAP"). Atlantic States operates two primary baghouses related to its melting operations in the foundry building, the Cupola Baghouse and the Melt Center Baghouse ("MCBH"). In addition, there is also the Core Department Baghouse, which controls emissions from the production of the cores. Lastly, the pipe is painted in the foundry building and the emissions controlled by filters in the paint booth.

During the opacity test the collection system operated normally for all of the above control devices. As noted in the test observations, the building opacity observations were always within the Foundry NESHAP opacity standard. In addition, observations from the Melt Center Baghouse and Cupola Baghouse exhaust stacks did not indicate any excess emissions from either point source.



By:

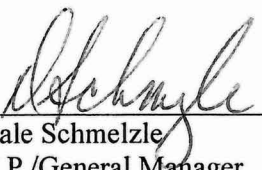
  
Patrick Hennessy

Director of Environmental Affairs

Dated:

11/18/13

By:

  
Dale Schmelzle

V.P./General Manager

Dated:

11/18/13





State of New Jersey

DEPARTMENT of ENVIRONMENTAL PROTECTION

CHRIS CHRISTIE  
Governor

KIM GUADAGNO  
Lt. Governor

Division of Air Quality  
Bureau of Air Permits  
401 E. State Street, 2<sup>nd</sup> floor, P.O. Box 420, Mail Code 401-02  
Trenton, NJ 08625-0420

BOB MARTIN  
Commissioner

DEPP-APB

2013 FEB 26 PM 3:22

ENVIRONMENTAL PROTECTION  
DEPARTMENT

February 19, 2013

Dale Schmelzle  
VP / General Manager  
Atlantic States Cast Iron Pipe Company  
183 Sitgreaves St  
Phillipsburg, NJ 08865

Re: **Operating Permit Renewal Application**  
ATLANTIC STATES CAST IRON PIPE CO  
Permit Activity Number: BOP110001  
Program Interest Number: 85441  
**ADMINISTRATIVE COMPLETENESS – WITH APPLICATION SHIELD**

Dear Mr. Dale Schmelzle:

I have reviewed the subject application and have determined it is administratively complete.

Pursuant to the provision of N.J.A.C. 7:27-22.7, an application shield will be in effect beginning on February 19, 2013, the expiration date of the current operating permit for your facility. The application shield will terminate automatically when the Department takes final action on your application.

The Bureau has received the Compliance Assurance Monitoring or "CAM" applicability determination for your facility. If you have determined that CAM is applicable, then during the technical review of your application, we will review the plan to ascertain that the CAM plan provides a reasonable assurance of compliance with emission limitations by monitoring the operation and maintenance of facility's control devices.

Please contact your permit evaluator, Mubin Kathrada at (609) 633-1134 you have any questions regarding this matter. However, please address all correspondence related to this letter to me.

Sincerely,

Max Friedman  
Bureau of Air Permits

C: S. Riva - EPA Region II





**Riva, Steven**

---

**From:** Kathrada, Mubinul [Mubinul.Kathrada@dep.state.nj.us]  
**Sent:** Monday, July 22, 2013 4:47 PM  
**To:** Chan, Suilin; Chan, Suilin; Majette, Yolanda; Riva, Steven  
**Cc:** Friedman, Max  
**Subject:** New Jersey Draft Renewal Operating Permit Notice

Operating Permit Renewal for Atlantic States Cast Iron Pipe  
Program Interest Number: 85441, Permit Activity Number: BOP110001

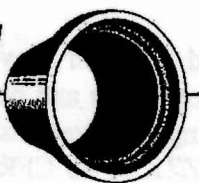
As a courtesy, I am providing you with this notice of New Jersey's intent to approve an Air Pollution Control Operating Permit Renewal for Atlantic States Cast Iron Pipe, which is located at 183 Sitgreaves Ave, Phillipsburg, NJ 08865. The public notice, statement of basis, and the draft permit will soon be posted at the Department's website: <http://www.state.nj.us/dep/agpp/publicnotices.htm>. The public comment period closes on August 26, 2013. This notice isn't meant to replace the "proposed permit" process in 40CFR70.

The facility has represented compliance with all the applicable requirements. Therefore, there are no compliance schedules included with this permit approval.

Should you want more information regarding this draft permit or if you would like to comment, please call Max Friedman at 609-633-8230.



# Atlantic States



A DIVISION OF McWANE INC.  
AN ISO 9002 CERTIFIED COMPANY

183 Sitgreaves Street  
Phillipsburg, NJ 08865  
908-454-1161  
FAX 908-454-1026

September 13, 2013

**Via Email / Certified Mail / RR**

Ed Choromanski, Director  
Air Quality Enforcement  
New Jersey Department of Environmental Protection  
401 East State Street, 2<sup>nd</sup> Floor  
PO Box 420  
Trenton, New Jersey 08625-0028

**Re: Atlantic States Cast Iron Pipe Company  
Subpart ZZZZZ Opacity Test Requirement  
Notification of Opacity Test**

Dear Mr. Choromanski:

Atlantic States Cast Iron Pipe Company is subject to the National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries Area Sources at 40 CFR 63.10880 et seq. (the "Foundry NESHAP"). One of the requirements of the Foundry NESHAP is to perform an opacity observation of the facility while a performance test for PM and metal HAPS is conducted [Table 1 of Subpart ZZZZZ of 40 CFR 63 2.a.ii and 40 CFR 63.6(h)(5)(i)]. The purpose of this letter is to notify you that Atlantic States will be performing an opacity observation of the building on Tuesday, October 15, 2013 during our annual stack test [40 CFR 63.6(h)(4) and 63.9(f)]. We will also reserve Wednesday, October 16, 2013 as a contingency day, since this will be our second day of stack testing.

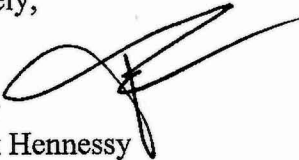
Atlantic States will conduct the opacity test for fugitive emissions from the foundry building using two certified opacity readers. Two certified observers will be used to conduct the opacity test according to EPA Method 9 (40 CFR part 60, appendix A-4) and 40 CFR 63.6(h)(5). The Foundry NESHAP opacity standard for fugitive emissions from foundry buildings is 20% with an allowance of up to 30% during one six minute averaging period in any one hour.

Ed Choromanski  
New Jersey Department of Environmental Protection  
Air Quality Enforcement  
Page 2 of 2

The federal regulations provide that "the certified observer may identify a limited number of openings or vents that appear to have the highest opacities and perform opacity observations on the identified openings or vents in lieu of performing observations for each opening or vent from the building or structure" [Table 1 of Subpart ZZZZZ of 40 CFR 63 2.a.i]. The opacity test at the facility will be concentrated on the openings and vents that have the potential for the highest opacity readings from the foundry building. Please see the enclosed procedure "Procedure for NESHAPS Requirement for Building Visible Opacity Observations" that Atlantic States will be following to conduct this test.

Should you have any questions, please contact Patrick Hennessy at (908) 454-1161, ext. 0841.

Sincerely,

A handwritten signature in black ink, appearing to be 'Patrick Hennessy', with a stylized, looping flourish.

Patrick Hennessy  
Director of Environmental Affairs

Cc: Steven Riva – EPA Region II  
Max Friedman  
Todd Boyer  
Andrew McNeel, Arrow Environmental Consulting, LLC

Atlantic States Cast Iron Pipe Company

Procedure for  
NESHAPS Requirement for Building Visible Opacity Observations  
[40 CFR 63.10895(e) and 63.10898(i)]

Atlantic States is required to conduct opacity readings on the foundry building once every 6 months. Atlantic States is also required to perform building opacity readings during stack tests and each time a process change is made that is likely to increase fugitive emissions.

**Observation Areas**

Opacity observations should be made of the entire Foundry Building; however, Table 1 2(a)(i) of subpart §63.6(h)(5) allows observations through a "limited number of openings or vents that appear to have the highest opacities and perform opacity observations on the identified openings or vents in lieu of performing observations for each opening or vent from the building or structure." Atlantic States has chosen to use Table 1 2(a)(i) for the building opacity observations for several reasons. The main building has only 3 main areas that create visible emissions inside of the building. Those areas are the Melting, Casting and Core Floor areas. All three of these areas are physically located close to each other. The other operations in the facility generate much less visible emissions inside of the building. The melting, casting and core floor areas would generate the highest opacities from the building near the building openings associated with those areas. Based upon years of general observations, no visible emissions exclusive of water vapor have been observed coming out of the Static Foundry area, the annealing oven area, inspectors' station after the oven, test presses, cement line, paint line and bundling areas, as well as the Machine Shop / Casting Mold repair building. As such, the building opacity observations only concentrated on the Melting, Casting and Core Floor areas that the building surrounds.

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a lot because the Melt Center Baghouse blocks most of the view of the building, so this person has to walk around the Baghouse in order to get a good view of all faces of the building.

### **Procedure**

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State of New Jersey

DEPARTMENT of ENVIRONMENTAL PROTECTION

CHRIS CHRISTIE  
Governor

KIM GUADAGNO  
Lt. Governor

Division of Air Quality  
Bureau of Air Permits  
401 E. State Street, 2<sup>nd</sup> floor, P.O. Box 420, Mail Code 401-02  
Trenton, NJ 08625-0420

BOB MARTIN  
Commissioner

August 27, 2013

Mr. Steve Riva, Chief  
Permitting Section  
USEPA, Region 2  
290 Broadway, 25<sup>th</sup> Floor  
New York, NY 10007-1866

Re: Atlantic States Cast Iron Pipe Co  
Facility Program Interest No. 85441, Permit Activity No.: BOP110001  
**PROPOSED OPERATING PERMIT RENEWAL**

Dear Steve:

This Proposed Air Pollution Control Operating Permit Renewal for Atlantic States Cast Iron Pipe Co, which is located at 183 Sitgreaves St, Phillipsburg, NJ 08865, has completed the 30-day public comment period. No comments were received during the public comment period.

No comments were received from the EPA during the public comment period.

Should you want more information regarding this proposed permit, please call me at 609-633-8230.

Sincerely,

Max Friedman  
Bureau of Air Permits







**State of New Jersey**  
**DEPARTMENT of ENVIRONMENTAL PROTECTION**

CHRIS CHRISTIE  
*Governor*

KIM GUADAGNO  
*Lt. Governor*

Division of Air Quality  
Bureau of Air Permits  
401 E. State Street, 2<sup>nd</sup> floor, P.O. Box 420, Mail Code 401-02  
Trenton, NJ 08625-0420

BOB MARTIN  
*Commissioner*

August 13, 2012

Mr. Steve Riva  
Chief, Permitting Section  
USEPA, Region 2  
290 Broadway, 25<sup>th</sup> Floor  
New York, NY 10007-1866

Re: Atlantic States Cast Iron Pipe Co  
Facility Program Interest No. 85441, Permit Activity No.: BOP120001

Dear Steve:

This notice is required by the provisions of 40 CFR Part 70 and N.J.A.C. 7:27-22 and is to inform you of the Department's receipt of an administratively complete application for a minor modification to an approved Operating Permit for Atlantic States Cast Iron Pipe Co, which is located at 183 Sitgreaves St, Phillipsburg, NJ 08865.

The facility proposes to re-duct the ETA baghouse discharge air flow from inside the facility to the outdoor atmosphere.

If you would like to comment on this application, please contact me in writing at the above address within 45 days. The 45-day review period expires on September 29, 2012. Should you want more information regarding this minor modification, please call me at 609-633-8230.

Sincerely,

Max Friedman  
Bureau of Air Permits





# State of New Jersey

CHRIS CHRISTIE  
Governor

## DEPARTMENT of ENVIRONMENTAL PROTECTION

BOB MARTIN  
Commissioner

KIM GUADAGNO  
Lt. Governor

Division of Air Quality  
Bureau of Air Permits  
401 E. State Street, 2<sup>nd</sup> floor, P.O. Box 27  
Trenton, NJ 08625-0027

### Air Pollution Control Operating Permit Operating Permit Renewal

Permit Activity Number: BOP070001

Program Interest Number: 85441

Mailing Address	Plant Location
DALE SCHMELZLE VICE PRESIDENT / GENERAL MANAGER ATLANTIC STATES CAST IRON PIPE CO 183 SITGREAVES ST. PHILLIPSBURG, NJ 08865	ATLANTIC STATES CAST IRON PIPE CO 183 Sitgreaves St Phillipsburg Town Warren County

**Initial Operating Permit Approval Date: February 20, 2003**

**Operating Permit Renewal Approval Date: June 27, 2011**

**Operating Permit Renewal Expiration Date: February 19, 2013**

This operating permit renewal is approved and issued under the authority of Chapter 106, P.L. 1967 (N.J.S.A. 26:2C-9.2). This permit shall allow for inspection and evaluation to assure conformance with all provisions of N.J.A.C. 7:27 et seq.

This operating permit renewal hereby supersedes any previous Air Pollution Control Operating Permit issued to the facility by the Department, and any significant modification, minor modification, seven-day notice change, or administrative amendment to such permit. Equipment at the facility shall be operated in accordance with the enclosed permit conditions.

This operating permit includes a permit shield, pursuant to the provisions of N.J.A.C. 7:27-22.17. However, this permit shield does not cover physical changes which were undertaken at the facility after March 3, 2003 and for which the facility did not seek a PSD applicability determination from USEPA. The issuance of this permit should not in any way be construed as a determination by the Department that the PSD rules do not apply. Any questions on applicability of PSD should be directed to EPA Region II, Air Programs Branch, 21st Floor, 290 Broadway, New York, NY 10007-1866.

This operating permit does not include compliance schedules as part of the approved compliance plan.

The permittee shall submit to the Department and to the EPA on forms provided by the Department, at the addresses given below, a periodic compliance certification, in accordance with N.J.A.C. 7:27-22.19 and the schedule for compliance certifications set forth in the compliance plan in this operating permit. The annual compliance certification reporting period will cover the calendar year ending December 31. **The annual compliance certification is due to the Department and the EPA within 60 days after the end of each calendar year during which this permit was in effect.** Forms provided by the Department can be found on the Department's website at: <http://www.nj.gov/dep/enforcement/compliancecertsair.htm>.

The annual compliance certification report may also be considered as your six month deviation report for the period from July 1 through December 31 which is due by January 30 of each year, as required by paragraph 13 in Section F, *General Provisions and Authorities*, of this permit, if the annual compliance certification is submitted by January 30.



New Jersey Department of Environmental Protection  
Air & Environmental Quality Enforcement  
401 East State Street, P. O. Box 422  
Trenton, New Jersey 08625-0422

United States Environmental Protection Agency, Region II  
Air Compliance Branch  
290 Broadway  
New York, New York 10007-1866

New Jersey Department of Environmental Protection  
Air and Environmental Quality Compliance & Enforcement  
Northern Regional Enforcement Office  
7 Ridgedale Avenue  
Cedar Knolls, New Jersey 07927

Your facility's current approved operating permit and any previous versions (e.g. superseded, expired, or terminated) are now available for download in the PDF format at: <http://www.nj.gov/dep/aqpp/>. After accessing the website, click on "Approved Operating Permits" listed under "Reports" and then type in the Program Interested (PI) Number as instructed on the screen. A RADIUS file for your permit, containing Facility Specific Requirements (Compliance Plan), Inventories, and Compliance Schedules (if needed), can be obtained by contacting your permit writer. Upon importing this information into your personal computer with RADIUS software, you will have up-to-date information in RADIUS format. RADIUS software, instructions, and help are available at the Department's website at [www.state.nj.us/dep/aqpp](http://www.state.nj.us/dep/aqpp). We also have an Operating Permit Help Line available from 9:00 AM to 4:00 PM daily, where you may speak to someone about any questions you may have. The Operating Permit Help Line number is 609-633-8248.

The permittee is responsible for submitting a timely and administratively complete operating permit renewal application. The application is considered timely if it is received at least 12 months before the expiration date of the operating permit. To be deemed administratively complete, an application for renewal of the operating permit shall include all of the information required by the application form for the renewal and the information required pursuant to N.J.A.C. 7:27-22.30(d). However, consistent with N.J.A.C. 7:27-22.30(c), the permittee is encouraged to submit the renewal application at least 15 months prior to expiration of the operating permit, so that the Department can notify the applicant of any deficiencies in the application. This will allow the permittee to correct any deficiencies, and to better ensure that the application is administratively complete by the renewal deadline. Only applications which are timely and administratively complete will be eligible for coverage by an application shield. The renewal application can be found at our website, <http://www.state.nj.us/dep/aqpp/downloads/forms/OPRenewal.PDF>.

Permittees that are subject to Compliance Assurance Monitoring (CAM), pursuant to 40 CFR 64, shall develop a CAM Plan for modified equipment as well as existing sources. Details of the rule and guidance on how to prepare a plan can be found at EPA's website: [www.epa.gov/ttn/emc/cam.html](http://www.epa.gov/ttn/emc/cam.html). In addition, CAM Plans must be included as part of the permit renewal application. Permittees that do not submit a CAM Plan may have their modification applications denied, pursuant to N.J.A.C. 7:27-22.3.

If you have any questions regarding this permit approval, please call your permit writer, Shafi Ahmed at (609) 633-2971.

Approved by:



Max Friedman  
Bureau of Air Permits

Enclosure

CC: S. Riva, USEPA Region II  
Chief NRO (Signature Page Only)